

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Joint Administration Requested)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Hunton Andrews Kurth LLP and Potter Anderson & Corroon LLP hereby appear as counsel for Barclays Bank PLC, in its capacity as DIP Repo Agent and DIP Repo Purchaser, and Barclays Capital Inc., in its capacity as DIP MSFTA Counterparty, (collectively, “Barclays”) in the above-captioned proceeding pursuant to 11 U.S.C. § 1109(b) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

**PLEASE TAKE FURTHER NOTICE** that Barclays hereby requests, pursuant to Bankruptcy Rule 2002 that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following person at the address indicated:

Peter S. Partee, Sr.  
Brian M. Clarke  
**HUNTON ANDREWS KURTH LLP**  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 309-1000  
ppartee@huntonak.com  
brianclarke@huntonak.com

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

Jennifer E. Wuebker  
**HUNTON ANDREWS KURTH LLP**  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, VA 23219  
Telephone: (804) 788-8200  
jwuebker@huntonak.com

Jeremy W. Ryan (No. 4057)  
Aaron H. Stulman (No. 5807)  
Andrew L. Brown (No. 6766)  
**POTTER ANDERSON & CORROON LLP**  
1313 N. Market Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
jryan@potteranderson.com  
astulman@potteranderson.com  
abrown@potteranderson.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document filed with, or otherwise brought before, this Court with respect to the above-captioned bankruptcy proceeding, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, e-mail, telex or otherwise.

**PLEASE TAKE FURTHER NOTICE** that Barclays intends that neither this *Notice of Appearance and Request for Service of Papers* nor any later appearance, pleading, claim or suit shall waive (i) Barclays's right to have final orders in non-core matters entered only after de novo review by a higher court, (ii) Barclays's right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to these bankruptcy cases, (iii) Barclays's right to have

the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, (iv) Barclays's right to enforce any contractual provisions with respect to arbitration, or (v) any other rights, claims, actions, defense, setoffs, or recoupments to which Barclays is or may be entitled under agreements, in law or in equity, including the right to contest the jurisdiction of the United States Bankruptcy Court for the District of Delaware over Barclays, all of which rights, claims, actions, defense, setoffs, and recoupments Barclays expressly reserves.

Dated: June 30, 2022  
Wilmington, Delaware

Respectfully submitted,

/s/ Jeremy W. Ryan

Jeremy W. Ryan (No. 4057)

Aaron H. Stulman (No. 5807)

Andrew L. Brown (No. 6766)

**POTTER ANDERSON & CORROON LLP**

1313 N. Market Street, 6<sup>th</sup> Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: jryan@potteranderson.com

astulman@potteranderson.com

abrown@potteranderson.com

– and –

Peter S. Partee, Sr. (*pro hac vice* admission pending)

Brian M. Clarke (*pro hac vice* admission pending)

**HUNTON ANDREWS KURTH LLP**

200 Park Avenue

New York, New York 10166

Telephone: (212) 309-1000

Email: ppartee@huntonak.com

brianclarke@huntonak.com

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Jennifer E. Wuebker (*pro hac vice* admission pending)

**HUNTON ANDREWS KURTH LLP**

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219

Telephone: (804) 788-8200

Email: jharbour@huntonak.com

*Counsel for Barclays Bank PLC and Barclays Capital Inc.*